



## Department of Environmental Protection

Central Regional Office • 8 New Bond Street, Worcester MA 01606 • 508-792-7650

Charles D. Baker  
Governor

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Secretary

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August 11, 2015

Mr. Sean Fleming, Plant Manager  
Rubbair LLC  
100 Groton-Shirley Road  
Ayer, MA 01432

**RE: AYER**  
Class: SM-25  
FMF No.: 130198  
**25% Facility Emission Cap Approval**

Dear Mr./ Fleming:

Enclosed for your files is a copy of your facility's BWPAQ Emissions Notification Form as processed by Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Air and Waste. As submitted on August 10, 2015 by Tim St. Onge Vice-President of Eliason Corporation on your behalf, you requested an emissions cap of 25% of all applicable thresholds for your facility located at 100 Groton-Shirley Road in Ayer, Massachusetts ("Facility").

The cap on these emissions is summarized in Table 1, below.

| TABLE 1 – Annual Pollutant Emission Limits for 25% Emission Cap Compliance (tons per year) |                 |                 |    |                  |            |                      |
|--|-----------------|-----------------|----|------------------|------------|----------------------|
| VOC  | NO <sub>x</sub> | SO <sub>x</sub> | CO | PM <sub>10</sub> | HAP single | HAP (combined total) |
| 15   | 15              | 25              | 25 | 25               | 2.5        | 6.25                 |

**Table 1 Key:**

*VOC = Volatile Organic Compounds*

*NO<sub>x</sub> = Nitrogen Oxides*

*SO<sub>x</sub> = Sulfur Dioxide*

*CO = Carbon Monoxide*

*PM<sub>10</sub> = Particulate Matter less than or equal to 10 microns in diameter*

*HAP (single) = maximum single Hazardous Air Pollutant*

*HAP (total) = total Hazardous Air Pollutants.*

By complying with the 25% Facility emission cap, you will no longer be subject to the restrictions established in your RES Transmittal 77988, which was issued on September 12, 1995. As stated in 310 CMR 7.02(11)(b), operation under this Facility wide emission cap does not relax or eliminate any emission limitations or record keeping requirements established by regulation or by previously issued source-specific plan approvals or emission control plans. In addition, it does not eliminate the preconstruction plan approval requirements of 310 CMR 7.02.

310 CMR 7.02(11) details specific record keeping and reporting requirements of an owner/operator electing to limit their facility's potential and actual emissions through this regulation. Compliance with these requirements is integral part of maintaining your compliance with the emissions cap.

Such records shall contain, but are not limited to, the items as listed under 310 CMR 7.02(11)(h). Details of facility specific record keeping items can be found at the following link;  
<http://www.mass.gov/eea/agencies/massdep/air/regulations/310-cmr-7-00-air-pollution-control-regulation.html> .

The owner shall establish and maintain records of actual emissions. Such information shall be summarized in a monthly log, maintained **on-site** for five years, and be made available to MassDEP or U.S. Environmental Protection Agency staff *upon request of the agency*. Source Registration is the only reporting requirement that shall be submitted to MassDEP in accordance with the schedule as required under 310 CMR 7.12.

The Facility's change in status will be reflected in your Fiscal Year (FY) 2016 and subsequent statements. Should you have any questions in regards to this action, please feel free to contact me at the Central Regional Office, (508) 767-2845.

Sincerely,

This final document copy is being provided to you electronically by the  
Department of Environmental Protection. A signed copy of this document  
is on file at the DEP office listed on the letterhead.

Roseanna E. Stanley  
Permit Chief  
Bureau of Air and Waste

Enclosure